

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

DARKPULSE, INC.,

Plaintiff,

v.

FIRSTFIRE GLOBAL OPPORTUNITIES
FUND, LLC, and ELI FIREMAN,

Defendants.

CIVIL ACTION NO. 22-cv-22111

**ORDER TO SHOW CAUSE FOR
PRELIMINARY INJUNCTION
AND TEMPORARY
RESTRAINING ORDER**

Upon consideration of the Declaration of Dennis O’Leary, Dated January ___, 2022; Plaintiff’s motion for Temporary restraining Order, and accompanying memorandum of law, it is hereby

ORDERED, that Defendants FirstFire Global Opportunities Fund, LLC, and Eli Fireman (“Defendants”) show cause before the Honorable _____ U.S. District Judge, of the United States District Court for the Southern District of New York, at courtroom ____, United States Courthouse, 500 Pearl Street, in the City, County and State of New York, or as soon thereafter as counsel may be heard, why an Order should not issue:

- (a) Granting Plaintiff DarkPulse, Inc., a preliminary injunction pursuant to Fed. R. Civ.P.65, enjoining, during the pendency of this action, Defendants and their agents, servants, employees, attorneys, and affiliates, from selling, transferring, assigning, encumbering, or otherwise disposing of any DarkPulse shares of common stock currently in their possession or control; and
- (b) Awarding to DarkPulse such other relief as the Court shall deem just and proper.

It is further

ORDERED that, sufficient reason having been shown therefore, pending the hearing on Plaintiff's motion for a preliminary injunction, and pursuant to Fed. R. Civ. P. Rule 65, the Defendants are hereby temporarily restrained and enjoined from taking any steps or other process that result in any attempt to sell, transfer, assign, encumber, or otherwise dispose of any DarkPulse shares of common stock whatsoever; and it is further

ORDERED that, security in the amount of _____ be posted by Plaintiff prior to _____, at _____ o'clock in the noon of that day; it is further

ORDERED that delivery by Electronic Service via ECF of a copy of this Order to Show Cause and the papers upon which it is based upon Defendants or their counsel, who have agreed to accept service electronically, shall be deemed good and sufficient service thereof; it is further

ORDERED that Plaintiff Darkpulse, Inc, must submit and serve its motion for a preliminary injunction by _____, and it is further

ORDERED that answering papers, if any, shall be electronically served no later than _____.

Dated: January ____, 2022
New York, New York.

SO ORDERED.

United States District Judge